

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION (CLEVELAND)**

**VIRGINIA BARNES**, individually  
and on behalf of all similarly  
situated individuals,

Plaintiffs,  
vs.

**THE PROGRESSIVE CORPORATION;  
PROGRESSIVE NORTHERN  
INSURANCE COMPANY; DRIVE  
INSURANCE HOLDINGS, INC; and  
DOES 1-10.**

Defendants.

Case No. 1:17-cv-00865

Hon. Patricia A. Gaughan

**MOTION TO ADMIT MOLLY E.  
NEPHEW PRO HAC VICE**

---

**MOTION FOR ADMISSION OF MOLLY E. NEPHEW  
PRO HAC VICE**

Pursuant to N.D. Ohio Civ. R. 83.5(h), Mark M. Abramowitz, attorney for Plaintiff, Virginia Barnes, in the above-captioned action, hereby moves the Court to admit Molly E. Nephew *pro hac vice* to appear and participate as counsel or co-counsel in this case for Plaintiff, and in support of her motion, states as follows:

1. Ms. Nephew has been a member of the bar of the State of Minnesota since October 30, 2015.
2. Ms. Nephew is and has been a member in good standing of the bar of the United States District Court, District of Colorado since June 21, 2016.
3. Ms. Nephew is and has been a member in good standing of the bar of the United States District Court, District of Minnesota since July 5, 2016.

4. Ms. Nephew is and has been a member in good standing of the bar of the United States District Court, Central District of Illinois since April 17, 2017.
5. Ms. Nephew is a member in good standing in every jurisdiction in which she is admitted to practice.
6. There are no disciplinary proceedings pending against Ms. Nephew as a member of any bar in any jurisdiction.
7. Ms. Nephew is familiar with the Local Rules of the United States District Court for the Northern District of Ohio.
8. In further support of this motion, Ms. Nephew has submitted herewith her Certificate of Good Standing. *See* Exhibit A.
9. Ms. Nephew's relevant identifying information is as follow:

Molly E. Nephew, Esq.  
Johnson Becker, PLLC  
444 Cedar Street, Suite 1800  
Saint Paul, MN 55101  
Telephone No.: (612) 436-1800  
Fax No.: (612) 436-1801  
E-mail: [mnephew@johnsonbecker.com](mailto:mnephew@johnsonbecker.com)

WHEREFORE, the undersigned counsel respectfully moves this Court to admit Molly E. Nephew *pro hac vice*.

DATE: May 1, 2017

Respectfully Submitted,

*/s/ Mark M. Abramowitz*  
Mark M. Abramowitz (0088145)  
Mark A. DiCello (0063924)  
**DiCELLO LEVITT AND CASEY**  
7556 Mentor Ave.  
Mentor, Ohio 44060  
Telephone: (440) 953-8888  
Fax: (440) 953-9138  
mabramowitz@dlcfirm.com  
madicello@dlcfirm.com  
*Local Counsel for Plaintiff*

Jacob R. Rusch (MN Bar No. 391892)\*  
Molly E. Nephew (MN Bar No. 397607)\*  
*\*Pro Hac Anticipated*  
**JOHNSON BECKER, PLLC**  
444 Cedar Street, Suite 1800  
Saint Paul, Minnesota 55101  
Telephone: (612) 436-1800  
Fax: (612) 436-1801  
jrusch@johnsonbecker.com  
mnephew@johnsonbecker.com  
*Trial Attorneys for Plaintiff*